

EXHIBIT 16

Karp, Joshua

From: Campbell, Matt [MACampbell@winston.com]
Sent: Friday, June 06, 2008 4:28 PM
To: Stockinger, Trevor
Cc: Klein, Chuck
Subject: RE: Discovery Letter

Trevor,

We are still running a few issues by our client concerning some of your discovery requests. I will provide you a written response to your letter on Monday, and can be available for a call anytime on Tuesday or Wednesday. Please let me know when you are free. Thanks.

Matt

Matthew A. Campbell
Winston & Strawn LLP
1700 K Street, N.W.
Washington, D.C. 20006-3817
(202) 282-5848 (telephone)
(202) 282-5100 (facsimile)
macampbe@winston.com

-----Original Message-----

From: Stockinger, Trevor [mailto:TStockinger@irell.com]
Sent: Thursday, June 05, 2008 4:02 PM
To: Campbell, Matt
Cc: Klein, Chuck
Subject: RE: Discovery Letter

Matt:

We have attempted to arrange a telephonic meet and confer for nearly four weeks. Several times you have requested to delay the meet and confer because you claimed to be busy with motion practice or other issues in the related cases. Each time, we have accommodated your request and have been willing to delay receiving responses to GSK's numerous outstanding concerns regarding Abbott's production.

I am therefore surprised that the first substantive communication we received from you, the attached letter, does not address a single one of GSK's outstanding concerns. This, despite that on May 19 you agreed to send a letter answering our questions in a few days. Needless to say, we will be reticent in the future to be as accommodating as we have been in the past. As you can understand, we are concerned that these delays are prejudicing GSK.

By this Friday, please provide a written response to GSK's outstanding discovery issues, including those issues raised in our letters of May 7 and May 8. This responsive letter and your attached letter can provide a framework for concluding our meet and confer process on these issues early next week. Please let me know when you are available on Monday or Tuesday of next week to talk. If we cannot resolve the outstanding issues by June 13, GSK will consider the meet and confer process concluded with respect to GSK's concern about Abbott's responses to GSK's discovery requests.

Thank you,

Trevor

-----Original Message-----

From: Campbell, Matt [mailto:MACampbell@winston.com]
Sent: Wednesday, June 04, 2008 4:04 PM
To: Stockinger, Trevor

Cc: Klein, Chuck
Subject: Discovery Letter

Trevor,

Please see the attached discovery letter. Please let me know when you would like to talk.
Thanks.

Matt

Matthew A. Campbell
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<<21. Letter to T. Stockinger re Abbott's RFPs.pdf>>

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ccmailg.irell.com made the following annotations

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